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CHIEF OF STAFF

March 15, 2006

John M.S. Hoefer, Esquire
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC, 29202-8416

RECEIVED
2006 MAR 15 PM 4:34
SC PUBLIC SERVICE
COMMISSION

RE: Application of Palmetto Utility Protection Service, Incorporated for Assignment
of the 811 Abbreviated Dialing Code to Be Implemented in South Carolina
Docket No. 2005-390-C

Dear Mr. Hoefer:

Please find enclosed and served on you the Office of Regulatory Staff's First Continuing
Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,

Nanette S. Edwards

NSE/pjm

Enclosure

cc: Mr. Charles L.A. Terreni

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-390-C

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2005 MAR 15 PM 4:34
SC PUBLIC SERVICE
COMMISSION

IN RE: Application of Palmetto Utility)	OFFICE OF REGULATORY
Protection Services, Inc. for)	STAFF'S FIRST CONTINUING
Assignment of the 811 Abbreviated)	DATA REQUEST
Dialing Code in South Carolina)	

TO: John M.S. Hoefer, Counsel for Cellco Partnership d/b/a Verizon Wireless:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the within Data Requests upon Verizon Wireless, (hereafter referred to as "Verizon").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the

document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

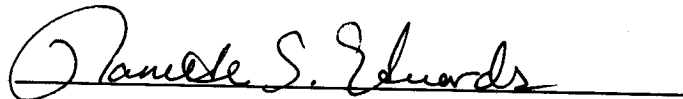
- I. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- II. That all responses to the data requests below be labeled using the same numbers as used herein.
- III. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jim McDaniel or Mak Moore, of the South Carolina Office of Regulatory Staff.
- IV. That this entire list of questions be reproduced and included in front of each set of responses.
- V. That each question be reproduced and placed in front of the response provided.
- VI. That Verizon provide six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that Verizon provide an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of Verizon's responses, the Verizon witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require Verizon to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

DATA REQUESTS

- 1.1 Is the N11 number, 811, in use in the State of South Carolina and if so, please provide the name and address of the individual(s) or entities that are currently using 811?
- 1.2 Does Verizon anticipate any technical and/or operational issues associated with the implementation of the 811 code?

March 15, 2006



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